## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE:	§	
	§	CASE NO 21-30071
THE GATEWAY VENTURES, LLC,	§	
	§	
	§	
Debtor.	§	

PRELIMINARY RESPONSE OF REORGANIZED DEBTOR TO MOTION TO EXPEDITE HEARING DATE ON EMERGENCY MOTION TO ENFORCE THE CHAPTER 11 PLAN, AND AWARD OTHER MISCELLANEOUS RELIEF (RE: DOCKET NO. 263)

## TO THE HONORABLE BANKRUPTCY JUDGE H. CHRISTOPHER MOTT:

The Gateway Ventures, LLC, the Reorganized Debtor ("TGV"), files this preliminary response to the above-captioned motion to indicate to the Court and other parties that the first date of availability for TGV personnel and counsel, following the holidays and previously scheduled vacation time and/or other commitments, for a hearing is January 5, 2021. TGV is communicating with all relevant parties to determine available hearing dates and has reached out specifically to Mr. Nevarez in this regard. TGV also understands that Mr. Davis is unavailable until the week of January 10, 2021.

Dated: December 22, 2021 Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN:. 24001846)

3030 Matlock Rd., Suite 201 Arlington, Texas 76105 Telephone: (713) 341-1158

Fax: (866) 666-5322

E-mail: jcarruth@wkpz.com

COUNSEL FOR THE GATEWAY VENTURES, LLC, REORGANIZED DEBTOR

2080013.DOCX

<u>CERTIFICATE OF SERVICE</u>

The undersigned hereby certifies that a true and correct copy of the foregoing was served on December 22, 2021 by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below.

ANY PARTY REQUESTING A FULL SIZED COPY OF THIS PLEADING OR COPIES OF ANY EXHIBITS SHOULD CONTACT THE UNDERSIGNED.

> /s/ Jeff Carruth JEFF CARRUTH

## 21-30071-hcm Notice will be electronically mailed to:

Jeff Carruth on behalf of Debtor The Gateway Ventures, LLC jcarruth@wkpz.com, jcarruth@aol.com;ATTY CARRUTH@trustesolutions.com

Harrel L. Davis, III on behalf of Creditor Suresh Kumar hdavis@eplawyers.com, vrust@eplawyers.com;vpena@eplawyers.com

James Michael Feuille on behalf of Creditor Ashish Nayyar jfeu@scotthulse.com, tmar@scotthulse.com

James Michael Feuille on behalf of Creditor Deepesh Shrestha jfeu@scotthulse.com, tmar@scotthulse.com

James Michael Feuille on behalf of Creditor Rahim Noorani jfeu@scotthulse.com, tmar@scotthulse.com

James Michael Feuille on behalf of Creditor Umesh Shrestha jfeu@scotthulse.com, tmar@scotthulse.com

Ryan Little on behalf of Interested Party Union Gateway, LLC <a href="mailto:little@mgmsg.com">little@mgmsg.com</a>, <a href="mailto:tsilva@mgmsg.com">tsilva@mgmsg.com</a>

Aldo R Lopez on behalf of Plaintiff Westar Investors Group, LLC alopez@raylaw.com, cchumsae@rmjfirm.com

Aldo R Lopez on behalf of Plaintiff Saleem Makani alopez@raylaw.com, cchumsae@rmjfirm.com

Aldo R Lopez on behalf of Plaintiff Suhail Bawa alopez@raylaw.com, cchumsae@rmjfirm.com

Clyde A. Pine, Jr. on behalf of Creditor HD Lending, LLC pine@mgmsg.com, clyde.pine@gmail.com

Donald P. Stecker on behalf of Creditor City Of El Paso don.stecker@lgbs.com

United States Trustee - EP12 USTPRegion07.SN.ECF@usdoj.gov

Eric Charles Wood on behalf of Creditor Westar Investors Group, LLC <a href="mailto:eric@brownfoxlaw.com">eric@brownfoxlaw.com</a>, <a href="mailto:melissa@brownfoxlaw.com">melissa@brownfoxlaw.com</a>

Eric Charles Wood on behalf of Creditor Saleem Makani <a href="mailto:eric@brownfoxlaw.com">eric@brownfoxlaw.com</a>, <a href="mailto:melissa@brownfoxlaw.com">melissa@brownfoxlaw.com</a>

Eric Charles Wood on behalf of Creditor Suhail Bawa eric@brownfoxlaw.com, melissa@brownfoxlaw.com